

...listen ...

May 19, 2004

Docket Management System, Doc No. FAA-2004-17458 - 7 U.S. Department of Transportation Room Plaza 401, 400 Seventh Street, SW. Washington, DC 20590-0001

Re: Docket number FAA-2004-17458, Badlands NP Air Tour Management Plan Scoping

Hello,

Thank you for the opportunity to submit comments as part of the scooping process for development of the Badlands National Park Air Tour Management Plans.

While Mt. Rushmore offers a fine opportunity for air tours, Badlands National Park deserves the highest level of protection for quiet recreation and visitor experiences. Badlands National Park offers singular visual beauty and opportunities for rich personal experience. A central element of the Badlands' visual and experiential significance is the sparse, barren "lifelessness" within which visitors may find deep solitude and discover the surprising wonders of life on the margins. The intrusion of aircraft noise would easily disrupt this power of the badlands to touch the soul. Therefore, FAA and NPS planners would be well-advised to offer a range of alternatives that lean toward extremely limited overflights of Badlands National Park.

I recommend including a range of alternatives that can provide an opportunity for the public and agency planners to carefully consider the effects of air tours on visitor experience at Badlands NP, with an eye (or ear) to defining a model for very modest air tour operations. Certainly, one alternative for Badlands NP should be no overflights at all. Allowing air tours one or two days a week would be a valuable alternative as well (one weekend day, one weekday); this could allow access to those who want or need it, while prioritizing the protection of quiet and solitude. Offering daily flights into a small fringe of the National Park could be an alternative, though limited hours and careful maintenance of strictly quiet areas would be necessary.

An important consideration when planning flight paths is the prevailing winds. Any attempt to maintain quiet zones within the Park will benefit from having flights take place on the downwind side of the affected area. This way, aircraft sounds carried by the wind will tend to move away from, rather than into, areas being managed for quiet recreation.

Good luck in wading through the piles of scooping comments! I look forward to being kept abreast of the development of this and other ATMPs.

Sincerely,

Jim Cummings

**Executive Director, Acoustic Ecology Institute** 

cummings@acousticecology.org